

1 William L. Hames, WSBA #12193
2 Hames, Anderson, Whitlow & O'Leary, P.S.
3 601 W. Kennewick Avenue
4 P.O. BOX 5498
5 Kennewick, WA 99336-0498
6 (509) 586-7797 / Fax (509) 586-3674
7 BillH@hawlaw.com

8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF WASHINGTON

10 In re:

11 GIGA WATT INC,

12 Debtor.

Case No. 18-03197-FPC11

AMENDED MOTION TO SHORTEN TIME
FOR STIPULATED MOTION TO MODIFY
THE AUTOMATIC STAY, AND NOTICE
THEREOF

13 COME NOW Mark Waldron, duly appointed Chapter 11 Trustee ("Trustee") in
14 the above-captioned proceeding, by and through his attorney Pamela Egan, and
15 creditor Port of Douglas County ("Port"), by and through its attorney William L. Hames
16 of Hames, Anderson, Whitlow & O'Leary, P.S., and move the above-entitled Court for
17 an order shortening time from 17 days (14 days plus 3 days mailing) to 8 days (5 days
18 plus 3 days mailing) for the motion to modify the automatic stay, filed herewith, (the
19 "Motion") so the Port may expend the remainder of its surety deposit, to complete the
20 restoration as set forth in the Motion for the reason that the contractor is currently on
21 site filling the hole left by Debtor, and completing work pursuant to a stipulation
22 previously approved by the above-entitled Court. There is, however, other work that
23 needs to be completed. If the contractor removes his equipment from the site and then
24 brings it back, it will cost the Port an additional \$10,000-\$15,000. Therefore, time is of
25 the essence for the Port to submit a change order to have this work completed while

AMENDED MOTION TO SHORTEN TIME AND
NOTICE THEREOF - 1

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1 the contractor is on site. A copy of the work to be performed and the estimate of costs
2 is attached to the Declaration of Lisa Parks.

3 **NOTICE**

4 **IF YOU OBJECT TO THE RELIEF REQUESTED ABOVE, YOU MUST FILE A**
5 **WRITTEN OBJECTION WITH THE CLERK OF THE ABOVE-ENTITLED COURT**
6 **AND REQUEST A HEARING AT PO BOX 2164, W. 904 RIVERSIDE, ROOM 304,**
7 **SPOKANE, WASHINGTON 99210, ON OR BEFORE 8 DAYS (5 DAYS PLUS 3**
8 **DAYS FOR MAILING) FROM THE DATE OF THIS NOTICE AND SERVE A COPY**
9 **ON THE UNDERSIGNED AT 601 W. KENNEWICK AVENUE, PO. BOX 5498,**
10 **KENNEWICK, WASHINGTON 99336; MARK D. WALDRON, CHAPTER 11**
11 **TRUSTEE, 6711 REGENTS BLVD. W., SUITE B, TACOMA, WA 98466-5421; AND**
12 **UPON THE OFFICE OF THE UNITED STATES TRUSTEE, 920 W. RIVERSIDE, STE.**
13 **593, SPOKANE, WA 99201.**

14 **SHOULD YOU FAIL TO OBJECT AS SET FORTH ABOVE, PLEASE**
15 **FURTHER BE ADVISED THAT THE RELIEF REQUESTED MAY BE GRANTED**
16 **WITHOUT FURTHER NOTICE TO YOU.**

17 DATED THIS 30th day of October 2019.

18 HAMES, ANDERSON, WHITLOW & O'LEARY, P.S.
19 Attorneys for Creditor Port of Douglas County

20 BY: /s/ William L. Hames
21 WILLIAM L. HAMES, WSBA #12193

22 POTOMAC LAW GROUP PLLC
23 Attorneys for Ch. 11 Trustee

24 BY: /s/ Pamela M. Egan with permission
25 PAMELA M. EGAN, WSBA # 54736

AMENDED MOTION TO SHORTEN TIME AND
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